

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

July 20, 2022

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Victor Marrero, U.S.D.J.
500 Pearl Street, Courtroom 15B
New York, NY 10007-1312

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.
Case No.: 1:21-cv-3858 (VM) (KHP)

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced case with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter the “Star Defendants”). The Star Defendants write to respectfully request an extension of time – until August 16, 2022 – to oppose the Third Party Defendants Barry Friedberg and Leonard Rodes, and Defendant Trachtenberg Rodes & Friedberg LLP’s (the “TRF Defendants”) motion to dismiss filed on July 15, 2022¹ to dismiss the Star Defendants’ Cross-Claims and Third-Party Complaint (hereinafter referred to as the “Motion”).

In compliance with ¶ 1(F) of this Court’s Individual Practices, the Star Defendants respectfully submit that: (i) there have been no previous requests for an extension of time to respond to the Motion; (ii) the TRF Defendants consent to the requested extension; and (iii) they are unaware of any scheduled dates that would be affected by the requested extension. The reason for the requested extension is because the primary attorneys responsible for opposing the instant motion are currently on trial in another matter and our firm is otherwise short-staffed as a result. The Star Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
July 20, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

via ECF (all counsel of record).

¹ This Court issued an Order on June 14, 2022 authorizing the filing of the Motion, which was limited to three (3) pages in length by its terms, without any specific deadline to file and serve same. Notwithstanding, the TRF Defendants filed the Motion more than a month later.